## BINGHAM

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November 27, 2013

#### Via ECFS

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Room TW-A325 Washington, DC 20554

Re: CC Docket No. 00-257: In the Matter of 2000 Biennial Review - Review of Policies and

Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers.

Notification of RigNet Satcom, Inc. pursuant to 47 C.F.R. § 64.1120(e)

Dear Ms. Dortch:

On behalf of RigNet SatCom, Inc. ("RigNet") and pursuant to Section 64.1120(e) of the Commission's Rules, 47 C.F.R. § 64.1120(e), this letter notifies the Commission of RigNet's intent to acquire the customer base of Stratos Offshore Services Company ("Stratos") associated with its retail energy business. A Joint Application for Commission approval of the transaction was filed on August 14, 2013 (WC Docket 13-224 and File No. ITC-ASG-20130815-00212).

<u>Names of the Parties to the Transaction</u>: The parties to the transaction are: Stratos Offshore Service Company, assignor, and RigNet SatCom, Inc., assignee.

Types of Telecommunications Services Provided to Affected Customers: The customers being transferred from Stratos to RigNet are primarily business and enterprise customers in the oil and gas industry. These customers receive interstate and/or intrastate domestic and international telecommunications service by way of wireless, satellite-based or other facilities.

<u>Date of the Transfer</u>: The planned transfer of Stratos' customers to RigNet will take place on or after December 31, 2013, or as soon as possible following receipt of regulatory approvals and satisfaction of other closing conditions.

<u>Certification of Compliance</u>: Attached hereto as <u>Attachment A</u> is a certification from RigNet required under Section 64.1120(e)(1) of the Commission's Rules.

<u>Copy of Notice Sent to Affected Subscribers</u>: Attached hereto as <u>Attachment B</u> is a copy of the form of customer notice that was mailed to affected customers on November 27, 2013.

Boston
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Washington

Bingham McCutchen LLP 2020 K Street NW Washington, DC 20006-1806

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Should there be any questions regarding this notification, please do not hesitate to contact us.

Respectfully submitted,

/s/ Catherine Wang

Catherine Wang Danielle Burt

Counsel for RigNet Satcom, Inc.

cc (via email): Bob Ward

Christine Crowe

## **ATTACHMENT A**

Certification of RigNet SatCom, Inc.

#### CERTIFICATION

On behalf of RigNet SatCom, Inc. ("RigNet"), and in accordance with Section 64.1120 of the Commission's rules, 47 C.F.R. § 64.1120, I hereby certify under penalty of perjury that I have read the foregoing notification and the statements contained therein are true, complete and correct to the best of my knowledge. I further certify that, with respect to the transfer of the customers of Stratos Offshore Services Company to RigNet, RigNet has complied with the Commission's requirements to provide advance customer notice in accordance with Section 64.1120(e)(3), with the obligations specified in that notice, and with other statutory and Commission requirements that apply to this streamlined process.

I certify under penalty of perjury that the foregoing is true and correct.

Name: Mark Slaughter

Title:

Chief Executive Officer and President

RigNet SatCom, Inc.

Date: 11.26.13

# ATTACHMENT B

**Sample Customer Notice** 





November 26, 2013

«AddressBlock»

«AddressBlock»

«AddressBlock»

«AddressBlock»

«AddressBlock», «AddressBlock» «AddressBlock»

«AddressBlock»

Regarding Your Account with Inmarsat/Stratos Offshore Services Company

Dear Valued Customer:

On August 1, 2013, RigNet SatCom, Inc. ("RigNet") announced an agreement with Stratos Offshore Services Company ("Stratos") to acquire certain assets of Stratos' business, subject to regulatory approval, including your account. Once that happens, your service will be provided by RigNet but under your current contract with Stratos.

Please rest assured that the transaction will not affect the services you currently receive. You will continue to receive services with the same rates, features, terms and conditions as you currently enjoy. Any changes to your service following the transaction will be made in compliance with your contract, service terms and applicable federal and state regulatory requirements. RigNet will automatically become your telecommunications provider upon final close on or after December 31, 2013.

This change will be completely seamless for you and you do not need to do anything in order for it to occur. RigNet will take care of all of the details and will be responsible for any change fees associated with transferring your account. However, it is important that you be aware of the following information. You are responsible for continued payment of your monthly recurring and usage charges throughout this period. Unless you have made arrangements on your own to switch your provider prior to the date that your services are transferred to RigNet, your account will automatically be transferred and your service contract assigned to RigNet. All preferred carrier freezes will be lifted for purposes of completing the transfer of your services to RigNet. RigNet will reinstate any preferred carrier freeze you may have with Stratos if you currently receive local telephone service from Stratos. In the event that you currently receive local service from a provider other than Stratos, you will need to contact your existing or new local service provider to reinstate your preferred carrier freeze. In addition, any deposit or prepayment you have paid, if any, will be transferred with your account to RigNet. Although subject to the terms of your current contract, you have the option to select another provider. We value your business and we hope that RigNet may continue to serve you. If you should choose another provider you will need to contact that carrier directly to arrange for the change prior to the transfer of your services to RigNet. We note that it can take several weeks for a new carrier to make the switch and you may also incur service initiation fees from that provider such as service order, installation and other similar charges associated with establishing a new service account.

Our mission is to provide superior products and services to our customers. We want to thank you for your continued support. If you have any questions regarding your current services, please call the Stratos customer service department at 1+800-563-2255. If you would like more information about the transaction, please call the RigNet customer service department toll-free at +1-888-974-4638.

RigNet looks forward to serving you.

Sincerely.

Mark Slaughter RigNet SatCom, Inc.

Bruce Henoch

Stratos Offshore Services Company

